

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]

OBJECTIVE/ PURPOSE OF POLICY

This policy sets the standards for managing, storing and preservation of documents of the Company which are broadly classified in the following two categories:

(a) documents whose preservation shall be permanent in nature (listed in **Annexure 1**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

(b) documents with preservation period of not less than eight years after completion of the relevant transactions (listed in **Annexure-2**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s).

This applies to both Physical and Electronic Documents.

COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Annexure 1

Documents whose preservation shall be permanent in nature

Sr. No.	Nature of Documents
1.	Common Seal
2.	Minutes Books of Board, General Meetings and Committees Meetings
3.	Statutory Registers
4.	Scrutinizers Reports
5.	Register of Members
6.	Licenses & Statutory Approvals
7.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
8.	Material Agreements/Contracts
9.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. No.	Nature of Documents
1.	Books of Accounts
2.	Annual Returns
3.	Attendance Register
4.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013.
5.	Income Tax Returns filed under Income Tax Act, 1961
6.	Copy of newspaper advertisement or publications
7.	Correspondences with Departments/shareholders
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.